Commonwealth of Kentucky
Division for Air Quality

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR PERMIT F-05-025 REV 1
SOUTHERN GRAPHIC SYSTEMS, INC.
7425 EMPIRE DRIVE, FLORENCE, KY 41042
APRIL 17, 2006
MARK LABHART, REVIEWER

SOURCE I.D. #:	021-015-00077
SOURCE A.I. #:	212
ACTIVITY #:	APE20050001

One comment was received from Paul G. Gaddie, EHS Manager, Southern Graphic Systems on October 19, 2005.

COMMENT RECEIVED:

Permit – F-05-025 Rev. 1
"We have a need for an additional solvent recovery still in our Flexo department. Initially it was thought we could survive with the one still and a centrifuge, but for several reasons, that scenario didn't happen. We have a still that we would like to install and run. … Can we replace the 'Centrifuge Separator…SJ700', listed on the permit on page 3, with a 'Solvent Recovery System, Progressive Recovery Inc., Model SC' "?

Division's response: Adding a second solvent recovery still to the permit should not create any problems. This is a control device rather than an emission unit, and as such, the permit emission limitations would not need to be changed, nor would any monitoring, or recordkeeping requirements need to be changed. Change made on page 3 of the permit, Centrifugal Separator SJ700 has been changed to Solvent Recovery System, Progressive Recovery Inc., Model SC

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.